

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of the Secretary

In the Matter of:

Petition of the Embarq Local Operating
Companies for Forbearance Under
47 U.S.C. § 160(c) From Enforcement
of Certain of ARMIS Reporting
Requirements

WC Docket No. 07-204

PETITION FOR FORBEARANCE

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PETITION FOR FORBEARANCE

I. INTRODUCTION AND SUMMARY

Pursuant to 47 U.S.C. § 160(c) and 47 C.F.R. § 1.53, the Embarq Local Operating Companies (“Embarq”)¹ respectfully request that the Commission exercise its statutory authority to forbear from enforcing compliance with two ARMIS reports required by its rules for price cap incumbent local exchange carriers (“ILECs”).²

Earlier this year, AT&T Inc. filed a petition for its ILEC affiliates seeking forbearance from Commission rules that require filing of ARMIS Reports 43-05 (Service Quality Report), 43-06 (Customer Satisfaction Report), 43-07 (Infrastructure Report), and 43-08 (Operating Data Report).³ The only service providers commenting on AT&T’s

¹ The Embarq Local Operating Companies are listed in Appendix A. The ARMIS Report 43-05 and 43-08 filing entities are listed in Appendix B.

² These specific rules are codified at 47 C.F.R. §§ 43.21(g) and (j).

³ AT&T Inc. Petition for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain of the Commission’s ARMIS Reporting Requirements, WC Docket 07-139 (filed June 8, 2007). Separately, AT&T has sought forbearance from certain cost allocation rules under Parts 32 and 64, jurisdictional separations rules under Part 36, cost apportionment rules under Part 69, and ARMIS 43-03 and 43-04 reporting requirements

petition joined Embarq in supporting AT&T's request.⁴ The Commission can and should grant AT&T's petition and apply such forbearance to all ILECs subject to these particular rules. Embarq nevertheless files this separate Petition for comparable relief for its own operating companies. Accordingly, Embarq requests forbearance from ARMIS Reports 43-05 (quality of service) and 43-08 (operating data report). These reports currently remain applicable to Embarq as an independent ILEC.⁵

Section 10 of the Telecommunications Act of 1996 directs that the Commission "shall" forbear from applying or enforcing a regulation if enforcement is not necessary to ensure just and reasonable rates or to protect consumers, and if forbearance is consistent with the public interest.⁶ The standard for forbearance is plainly met here. These particular reporting requirements were adopted more than 15 years ago, as a temporary means of monitoring ILECs during their transition from rate of return to price cap regulation. They were intended to allow the Commission to confirm that price cap ILECs

under Part 43. Petitions of AT&T Inc. and BellSouth Telecoms., Inc. for Forbearance Under 47 U.S.C. § 160 (c) from Certain of the Commission's Cost Assignment Rules, WC Docket Nos. 07-21 and WC Docket No. 05-342 (filed Jan. 27, 2007 and Dec. 5, 2005). Embarq supports such relief, but it is outside the scope of this Petition.

⁴ Comments were filed on August 20, 2007. Cincinnati Bell Telephone Company, Qwest Corporation, and the United States Telecom Association also supported AT&T. Qwest more recently filed a broader petition, seeking forbearance from ARMIS Reports 43-01 through 43-08, Reports 495A and 495B, and Report 492A. Petition of Qwest Corp. for Forbearance from the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160(c), WC Docket No. 07-204 (filed Sept. 13, 2007; corrected Oct. 1, 2007).

⁵ ARMIS Reports 43-06 and 43-07 are required only of Bell Operating Companies ("BOCs").

⁶ 47 U.S.C. § 160(a).

were not sacrificing service quality and investment in order to maximize long term profits. The Commission has recognized, however, that quality of service and investment have both increased under price cap regulation. After all these years, these reporting requirements have outlived their original, temporary purpose. They impose a needless regulatory burden, and they are plainly unwarranted in today's competitive service environment.

II. ARMIS REPORTS 43-05 AND 43-08 HAVE BECOME OUTDATED.

As AT&T's petition explained, the Commission adopted the extensive ARMIS reporting rules two decades ago, after the divestiture of the former AT&T and the creation of the BOCs. The new equal access requirements meant that the Commission needed to regulate ILEC interstate access services sold to unaffiliated interexchange carriers. So the Commission created new rules to account for local exchange carrier costs, for allocating joint and common costs among regulated and unregulated activities, and for rate-of-return regulation of access rates. The Commission required BOCs and some other ILECs to provide vast amounts of cost data, in standardized format, so it could analyze cost-of-service and manage rate-of-return ratemaking.

In 1990, the Commission introduced price cap regulation. That made detailed ILEC cost data unnecessary, because interstate rates were no longer based on costs. The Commission readily acknowledged that ARMIS data was no longer needed for rate-making, but it nevertheless left the reporting requirements in place in order to monitor ILEC conduct. The Commission added more ARMIS reporting requirements, including the quality of service and infrastructure investment reports addressed by AT&T's

petition.⁷ ARMIS reporting requirements were extended to smaller, non-BOC ILECs, including Embarq, when they too graduated to price cap regulation in their markets.

In 1990, when it adopted the new service quality reporting rules including ARMIS Report 43-05, the Commission explained that these new reporting requirements would be temporary. They were to be a monitoring tool during the “transition” from the outgoing cost-based rate-of-return regulation to the new price cap regime.⁸ The Commission imposed them, in “an abundance of caution,” to rebut some parties’ “theoretical concern” (concern the Commission itself apparently did not share) that under the new price cap system ILEC service quality could deteriorate.⁹ For its part, the Commission correctly predicted price cap regulation would lead only to innovation and improvements in service quality.¹⁰

In all the years since, quality of service reports have shown that such worries were indeed unjustified. Quality of service levels have consistently increased. In today’s competitive services market, any price cap ILEC that allows service to deteriorate will quickly lose customers who can and do choose other options, including cable telephony,

⁷ ARMIS Report 43-05 requires calculation and reporting of “Installation and Repair Intervals (Interexchange Access),” “Installation and Repair Intervals (Local Service),” “Common Trunk Blockage,” “Total Switch Downtime,” “Occurrences of Two Minutes or More Duration Downtime,” and “Service Quality Complaints.”

⁸ 2000 Biennial Regulatory Review: Telecommunications Service Quality Reporting Requirements, Notice of Proposed Rulemaking, 15 FCC Rcd. 22113 at ¶ 8 (2000) (“2000 NPRM”).

⁹ Policy and Rules Concerning Rates for Dominant Carriers, Second Report and Order, 5 FCC Rcd. 6786 at ¶¶ 335-36 (1990) (“Price Cap Order”).

¹⁰ Policy and Rules Concerning Rates for Dominant Carriers, Order on Reconsideration, 6 FCC Rcd. 2637 at ¶ 178 (1991) (“Price Cap Recon Order”).

wireless, VoIP, and wireline CLEC services.¹¹ Embarq doubts ARMIS report 43-05 was necessary at the outset. It is surely unjustifiable today.

When the Commission adopted the operating data report requirement, it likewise expected that price cap “incentive regulation ... would encourage LECs to develop their infrastructure and promote innovation through the introduction of new service offerings.”¹² The Commission nevertheless determined to “monitor network investment and development” during the transition from rate of return regulation, “to ensure that the current high standards are maintained and improved,”¹³ and that price cap ILECs would not shortchange investment in pursuit of short-term profits. ARMIS Report 43-08, imposed in 1992, provides statistical data covering ILEC outside plant, access lines served by technology and by customer, volume of telephone calls and access minutes.

The old rationale for ARMIS Report 43-08 also no longer applies today, certainly not for Embarq. Its transition from rate of return to price cap regulation is long over. There is no longer any need to monitor network investment to ensure high service standards. The competitive market ensures appropriate levels of investment to support high levels of service. Nationwide, the amount of investment in communications service – particularly ILEC investment – is higher than it has ever been. In today’s competitive environment, no price cap carrier can neglect network investment for long.

¹¹ AT&T’s petition (at 6) notes that there are more than 217 million wireless subscribers today, a number that far exceeds traditional access lines. There are also more than 9.5 million cable telephony subscribers, and more than 4.2 million interconnected VoIP subscribers. These figures show how significantly the local services market has changed since these ILEC reporting requirements were put in place.

¹² Price Cap Order at ¶ 351.

¹³ Id. at ¶¶ 352-53.

There plainly is no longer any reason to continue with these once-temporary reporting requirements. In a competitive market, it is unfair and unreasonable to impose tedious and expensive reporting burdens on one class of competitors, including Embarq, when their cable, wireless, VoIP, and CLEC competitors have no such burdens. The time has come to remove, at the very least, the reporting quality of service and infrastructure reporting obligations from Embarq – if not from all ILECs.

At the same time, the Commission no longer needs the information sought by these old ARMIS reports. ARMIS reporting was not intended to serve any ongoing Commission policy or needs. To Embarq's knowledge, the Commission makes no particular use of these particular ARMIS reports. Moreover, the Commission obtains detailed industry information on service quality and network infrastructure through other means, including outage reporting under Part 4 of the Commission rules and detailed reporting through Form 477, which apply to all facilities-based service providers.

III. THE COMMISSION SHOULD FORBEAR FROM REQUIRING ARMIS REPORTS 43-05 AND 43-08 FROM EMBARQ.

Section 10 of the Act provides:¹⁴

[T]he Commission shall forbear from applying any regulation or any provision of the Act ... if the Commission determines that (1) enforcement ... is not necessary to ensure that the charges ... are just and reasonable and are not unjustly or unreasonably discriminatory; (2) enforcement ... is not necessary for the protection of consumers; and (3) forbearance ... is consistent with the public interest.

¹⁴ 47 U.S.C. § 160(a).

When the three statutory elements of section 10 are satisfied, the Act requires the Commission to forbear from applying or enforcing the regulation. Reviewing those standards shows that forbearance is met for Embarq.

A. ARMIS Report 43-05.

1. ARMIS Report 43-05 is not necessary to ensure just and reasonable and nondiscriminatory charges.

ARMIS Report 43-05 was never meant to ensure ILEC charges are just and reasonable. There is actually no connection between the report and ILEC rates, and certainly not the “strong connection” required by the D.C. Circuit between this reporting requirement and its regulatory purpose.¹⁵

This particular reporting requirement was adopted at the advent of price cap regulation in 1990 in “an abundance of caution” to address a “theoretical concern” that price cap carriers might reduce service quality in order to increase short term profits.¹⁶ The reporting requirement was meant to be temporary, “part of [the Commission’s] transition to price cap regulation.”¹⁷ Seventeen years later, the Commission has made no progress toward removing this outdated and unnecessary reporting requirement.

ARMIS Report 43-05 is indeed unnecessary. The Commission has recognized that ILEC service quality has improved not declined. Seven years ago, the Commission

¹⁵ Cellular Telecoms. & Internet Ass’n v. FCC, 330 F.3d 502, 512 (D.C. Cir. 2003).

¹⁶ Price Cap Order at ¶ 334.

¹⁷ 2000 NPRM at ¶ 8.

proposed rescinding most of Report 43-05.¹⁸ Since then, nearly every measure of service quality has only improved further.¹⁹ Customer complaints are down, installation intervals are shorter, trouble reports are lower, switch outages are fewer.

The Commission rightly predicted that price cap regulation would encourage service quality. It recognized that in today's competitive market, if any ILECs neglect their service quality, "the market will punish them through a loss of demand."²⁰ For its part, Embarq takes service quality very seriously. Embarq was rated the nation's "Highest Customer Satisfaction Among Large Enterprise Business Telephone Service Providers" by J.D. Power & Associates in 2007. At the CompTel Plus Convention and Expo in October, Embarq won three "best in class" awards for provisioning, service level agreements, and Integrated PRI (broadband), winning the highest average score across all service categories among all local exchange carriers.

2. ARMIS Report 43-05 is not necessary to protect consumers.

There also is no real connection between ARMIS Report 43-05 reports and protecting consumers. They are very "technical in nature"²¹ and were never intended for consumers. They were meant for the Commission's use in monitoring price cap ILECs' quality of service during the transition from traditional rate-of-return regulation – a

¹⁸ Id. at ¶¶ 2, 42.

¹⁹ Industry Anal. & Tech. Div., Wireline Competition Bur., Quality of Service of Incumbent Local Exchange Carriers, § 1.2 (Feb. 2007).

²⁰ Price Cap Order at ¶ 355.

²¹ 2000 NPRM at ¶ 14.

transition that -- for Embarq, if not all current price cap carriers -- was completed long ago.

Consumers have seen no deterioration in service quality. As the Commission predicted, they are protected by the incentives created by price cap regulation and by the availability of alternatives to ILEC service. In the seventeen years since ARMIS Report 43-05 was imposed, consumers' alternatives to ILEC service have grown dramatically. Today, consumers can secure services from a wide range of competing service providers, even in surprisingly low-density areas.

3. Forbearing from requiring ARMIS Report 43-05 is in the public interest.

That burden is no longer justified. In 2000, the Commission acknowledged that reports like these impose real costs on carriers.²² Embarq is uncertain of the total cost of complying with the ARMIS Report 43-05 requirement. The Office of Management and Budget ("OMB"), however, officially estimates that the burden associated with preparing ARMIS Report 43-05 is 849 hours for each respondent.²³ Like most price cap ILECs, Embarq has multiple study areas and operating companies. It is required to file twenty-two reports. It is thus expected to incur an estimated 19,778 skilled manhours (849 x 22) annually on highly-detailed reports the Commission long ago suggested are probably unneeded.

²² *Id.* at ¶¶ 1, 2 (noting also that "[w]e must be vigilant to deregulate where appropriate, consistent with the 1996 Act.").

²³ Public Information Collections Approved by Office of Management and Budget, 64 *Fed. Reg.* 15754 at 15754 (Apr. 1, 1999).

Those resources surely would be better spent by investing that much more in Embarq's network, speeding the expansion of high-speed Internet services, and introducing new and innovative services. Additionally, it is not in the public interest to have Embarq incurring these regulatory costs, when its competitors are not. The Commission does not "enhance competition among providers of telecommunications services," as required by the Act,²⁴ when it applies regulatory reporting burdens on just one type of competitor.

Furthermore, ARMIS Report 43-05 is at least partially redundant. The Commission requires all carriers – not just price cap carriers – to file section 4 reports. Those filings give the Commission basic oversight of service quality, at lower cost and without limiting responses to one group of competitors. Many state commissions also have separate quality reporting rules, which make this requirement all the more unnecessary.

B. ARMIS Report 43-08.

1. ARMIS Report 43-08 is not necessary to ensure just and reasonable and nondiscriminatory charges.

ARMIS Report 43-08 also was never intended to ensure that rates are reasonable. The Operating Data Report provides "information about the physical and operating

²⁴ 47 U.S.C. § 160(b).

characteristics” of price cap ILEC networks.²⁵ They have nothing to do with ILEC charges, and certainly not the “strong connection” required by the D.C. Circuit.²⁶

When adopted in 1992, ARMIS Report 43-08 was meant to help the Commission monitor potential “degradation” in ILEC networks during the transition to the price cap system.²⁷ The Commission expected that price cap regulation would “encourage LECs to develop their infrastructure and promote innovation.”²⁸ Nevertheless, because some feared that ILECs might under-invest in their networks, the Commission imposed this reporting requirement as a “short term,” transitional step to “monitor network investment and development.” In 2001, the Commission concluded that “there may be no need to collect [the] data in the longer term.”²⁹

Network investment did not decline. Investment by Embarq and other price cap ILECs has risen remarkably and consistently. Price cap ILECs have invested billions in their networks. Embarq has been upgrading from circuit-switching to packet-switching,

²⁵ The Operating Data Report lists data on ILEC networks, including outside plant, access lines in service, technology by access line and by customer, telephone call totals, and access minutes billed. 2000 Biennial Regulatory Review: Comprehensive Review of the Accounting Requirements and ARMIS Reporting Requirements for Incumbent Local Exchange Carriers: Phase 2, Report and Order, 16 FCC Rcd 19911 at ¶ 128 (2001) (“Phase 2 Order”).

²⁶ Cellular Telecoms. & Internet Ass’n, 330 F.3d at 512.

²⁷ 2000 Biennial Regulatory Review – Comprehensive Review of the Accounting Requirements and ARMIS Reporting Requirements for Incumbent Local Exchange Carriers: Phase 2 and Phase 3, Notice of Proposed Rulemaking, 15 FCC Rcd 20568 at ¶ 65 (2000) (concluding further, “our review reveals that many of the reporting requirements may have outlived their usefulness.”).

²⁸ Price Cap Order at ¶ 351.

²⁹ Phase 2 Order at ¶ 160.

expanding high speed Internet coverage farther and farther into its local service territories, and adding fiber to its network. Embarq also recently completed network upgrades in its Las Vegas, Nevada service territory providing industry-leading data speeds. Embarq has also made a name for itself as an innovator, including with its industry-leading “Smart Connect” product, which allows business customers to move calls between wireless and wireline networks, without interrupting the call.³⁰

2. ARMIS Report 43-08 is not necessary to protect consumers.

ARMIS Report 43-08 also was not designed to protect consumers. It provides high-level data on network investment, consolidated by local operating company – information that has no connection with consumer protection.

Given that the Commission has long recognized that price cap ILECs, including Embarq, have been investing vigorously, there is no reason to think continuing to document ILEC investment will benefit consumers in any way. Consumers are protected not by the filing of reports but by the availability of competitive alternatives to ILEC service. Under the price cap system, the presence of those competitors is a powerful incentive for ILECs not merely to maintain their networks but also to upgrade them for new services and features that consumers increasingly expect. In the 15 years since the Commission adopted the ARMIS Report 43-08 requirement, the number of options for consumers has grown remarkably. Cable telephony, wireless, wireline CLEC, and

³⁰ On October 7, New Paradigm Resources Group gave Embarq its “Communications Innovator Award” for this new product.

facilities-based VoIP services all compete for consumers' business. And all are investing in their networks.

ARMIS Report 43-08 serves only to increase costs for the one kind of competitor. It is a lopsided regulatory burden that, after all these years, serves only to drain resources away from other purposes that would more likely benefit consumers, including the very network investment that this report was once intended roughly to monitor.

3. Forbearing from requiring ARMIS 43-08 Reports is in the public interest.

The Commission's goal in imposing the ARMIS Report 43-08 requirement was to monitor certain ILECs' investment during their transition from rate of return to price cap regulation.

As with ARMIS Report 43-05, that transition ended long ago for Embarq and other price cap carriers. After fifteen years, ARMIS Report 43-08 fails to have the requisite "strong connection" with the Commission's goal of promoting network investment. Report 43-08 fails to provide a complete picture of infrastructure investment, because the report is only required from "one class of competitors,"³¹ even though cable telephony, wireless, wireline CLEC, and other competitors have been investing heavily in their own facilities.

Seven years ago, the Commission recognized that "it may be more appropriate for the Commission to collect the appropriate [network investment] information

³¹ Phase 2 Order at ¶ 160.

comprehensively” from all service providers.³² Additionally, as technologies converge, the Commission has “reason to re-examine the justifications for imposing detailed accounting and reporting requirements on only one class of competitors.”³³ As with ARMIS Report 43-05, the costs imposed by these lop-sided reports simply are no longer justified.

The cost of this reporting is not insignificant. The OMB estimate for ARMIS Report 43-08 is 160 hours for each respondent.³⁴ Embarq is required to file twelve separate reports. That official estimate suggests 1,920 skilled manhours (160 x 12) for ARMIS Report 43-08.

Like other ILECs, Embarq has been losing access lines to competition. It anticipates a net decline of 6% of total lines in 2007, on top of similar declines in recent years. Since 2001, Embarq’s total access line count has fallen from about 8 million to about 6.5 million, even while most of its service territories have seen growth in population. In today’s environment, and with local service revenues declining, every dollar is precious. Resources spent on these outdated and unnecessary reports would be better invested in Embarq’s network, upgrading facilities and extending DSL’s reach, and in product and service innovation.

Regardless, the Commission already has better tools for gathering network investment data. Six years ago, the Commission proposed eliminating ARMIS reports

³² Id. at ¶ 167.

³³ Id. at ¶ 206.

³⁴ 64 Fed Reg. at 15755.

43-07 and 43-08, and instead relying on Form 477.³⁵ Adopted in 2000, Form 477 does not apply just to one group of competitors. All local exchange carriers, mobile telephone carriers, and facilities-based providers of end-user broadband connections file Form 477.³⁶ It is also much more detailed. ARMIS Report 43-08 collects data by local operating company. Form 477 collects data by ZIP Code and by type of technology. The Commission has been considering revising Form 477 to make it even more granular. ARMIS Report 43-08 is now obsolete.

IV. CONCLUSION

In section 706 of the Act, Congress instructed the Commission to utilize forbearance to remove barriers to infrastructure investment in advanced facilities.³⁷ Embarq's petition presents just such a case. ARMIS Reports 43-05 and 43-08 have lingered years longer than the Commission originally planned, and years longer than warranted. The Commission should grant Embarq's Petition and forbear from requiring ARMIS Reports 43-05 and 43-08 from Embarq, if not from all price cap ILECs.

³⁵ Phase 2 Order at ¶ 211.

³⁶ Local Telephone Competition and Broadband Reporting, Report and Order, 19 FCC Rcd. 22340 at ¶ 8 (2004).

³⁷ 47 U.S.C. § 157 nt.

Respectfully submitted,

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APPENDIX A

EMBARQ LOCAL OPERATING COMPANIES
Subsidiaries of Embarq Corporation*

Central Telephone Company d/b/a Embarq
Central Telephone Company of Texas, Inc. d.b.a Embarq
Central Telephone Company of Virginia d/b/a Embarq
Embarq Florida, Inc.
United Telephone Company of Indiana, Inc. d/b/a Embarq
United Telephone Company of Eastern Kansas d/b/a Embarq
United Telephone Company of Kansas d/b/a Embarq
United Telephone Company of Southcentral Kansas d/b/a Embarq
Embarq Minnesota, Inc.
Embarq Missouri, Inc.
Carolina Telephone and Telegraph Company d/b/a Embarq
United Telephone Company of the West d/b/a Embarq
United Telephone Company of New Jersey, Inc. d/b/a Embarq
United Telephone Company of Ohio d/b/a Embarq
United Telephone Company of the Northwest d/b/a Embarq
United Telephone Company of Pennsylvania d/b/a Embarq
United Telephone Company of the Carolinas d/b/a Embarq
United Telephone-Southeast, Inc. d/b/a Embarq
United Telephone Company of Texas, Inc. d/b/a Embarq

APPENDIX B

EMBARQ FILING ENTITIES ARMIS Reports 43-05 and 43-08

COSA CODE	STUDY AREA	ARMIS 43-05	ARMIS 43-08
CETO	Central Telephone Company d/b/a Embarq		X
CENC	Central Telephone Company of North Carolina d/b/a Embarq	X	
CENV	Central Telephone Company of Nevada d/b/a Embarq	X	
CETX	Central Telephone Company of Texas d/b/a Embarq	X	X
CEVA	Central Telephone Company of Virginia d/b/a Embarq	X	X
UCFL	Embarq Florida Inc.	X	X
UTIN	United Telephone of Indiana, Inc. d/b/a Embarq	X	X
UTKS	United Telephone Companies of Kansas d/b/a Embarq	X	
UTMN	Embarq Minnesota, Inc.	X	
UTMO	Embarq Missouri, Inc.	X	X
UTNC	Carolina Telephone & Telegraph Company d/b/a Embarq	X	X
UTNE	United Telephone Company of the West – Nebraska d/b/a Embarq	X	
UTNJ	United Telephone Company of New Jersey, Inc. d/b/a Embarq	X	X
UTOH	United Telephone Company of Ohio d/b/a Embarq	X	X
UTOR	United Telephone Company of the Northwest – Oregon d/b/a Embarq	X	
UTPA	United Telephone Company of Pennsylvania d/b/a Embarq	X	X
UTSC	United Telephone Company of the Carolinas d/b/a Embarq	X	
UTIM	United Telephone – Southeast, Inc. d/b/a Embarq		X
UTTN	United Telephone - Southeast-Tennessee d/b/a Embarq	X	
UTVA	United Telephone – Southeast-Virginia d/b/a Embarq	X	
UTTX	United Telephone Company of Texas, Inc. d/b/a Embarq	X	X
UTWA	United Telephone of the Northwest-Washington d/b/a Embarq	X	
UTWY	United Telephone of the West – Wyoming d/b/a Embarq	X	
UTTC	Total Embarq LECs	X	